

### Remarks

The Office Action mailed January 24, 2005 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-35 and 37-46 are now pending in this application. Claims 1-46 stand rejected. Claims 36 has already been canceled.

In accordance with 37 C.F.R. 1.136(a), a two-month extension of time is submitted herewith to extend the due date of the response to the Office Action dated January 24, 2005, for the above-identified patent application from April 24, 2006, through and including June 24, 2006. In accordance with 37 C.F.R. 1.17(a)(3), authorization to charge a deposit account in the amount of \$450.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 1-35 and 37-46 under 35 U.S.C. § 103(a) as being unpatentable over Hull et al. (U.S. Patent No. 6,704,118) ("Hull") in view of Black et al. (U.S. Patent Publication No. 2002/0059317) ("Black") is respectfully traversed.

Applicant respectfully submits that neither Hull nor Black describe or suggest the claimed invention. As discussed below, at least one of the differences between the cited references and the present invention is that neither Hull nor Black describe or suggest a method for managing email content that includes automatically extracting the content of the network email using an email induction server and *triggering tasks to be performed as part of a workflow process based on the content extracted from at least of the network email and the at least one enclosure included with the network email.* (Emphasis added.)

Rather, Hull describes an automatic archiving system that makes document archiving largely transparent to the user. Documents scanned in, printed during the course of office equipment operation or emailed are automatically archived. For example, an office local area network (LAN) may interconnect a copier, a printer, a facsimile machine, and a document management workstation. Whenever, a document is copied, printed, or faxed, a document image is archived by the document management workstation without further user intervention. A single

user command results in the document being copied and archived, printed and archived, or faxed and archived.

Hull further describes email document archival as being performed by software on an email hub. The email hub software routes and delivers mail over networks. A configuration file can be configured so that the email hub sends a copy of every message sent and received by a user, including the origin and destination addresses and the date and time of transmission, to the document management workstation. Thus, every document that is emailed is also archived without further user input.

Notably, Hull does not describe or suggest extracting content from the email and triggering tasks to be performed based on the extracted content.

Black describes an automated data management system and method for logging, processing, and reporting a large volume of data having different file types, stored on different media, and/or run by different operating systems. The system is used for the purpose of document production in, for example, a lawsuit. The system includes a first server processor for restoring a plurality of received data files, wherein the data files are capable of being different file types; a file organizing/categorizing processor for organizing the received data files based on a predetermined user list into a source directory structure and a destination directory structure; a file logging processor for logging the received data files into a database formed by the source and destination directory structures and identifying a file type of the received data files; a de-duplicate processor for calculating a Secure Hash Algorithm (SHA) value of the received data files to determine whether the received data files have duplicates and flagging duplicated data files in the database; an image conversion processor for converting the remaining data files into image files, respectively; and a second server processor for exporting the image files.

Black also describes generating an ordered output of the image files for a print shop. This step includes assigning a bates number to each page of the image files. Bates numbering is a common organizational method used by law firms to identify documents while litigating a case. Notably, as described in Black, the assigning of a bates number to a document or image file occurs *without a review of the content of the file*. (Emphasis added.)

Furthermore, Black also describes generating slip sheets for the ordered output of the image files. Slip sheets help differentiate document breaks and are another common organizational tool used by law firms. Black does describe the slip sheet containing information gathered about the data file or information useful to a customer who reviews the report, such as a file name, a bates number, a date, a user name, an email folder, etc. But similar to the bates numbering, generating a slip sheet occurs *without a review of the content of the file*. (Emphasis added.) In other words, both the bates numbering and slip sheets in Black occur automatically *and without a review of the content of the file*. For each new page a bates number is sequentially added, regardless of the content of the page, and for each new document a slip sheet is added, regardless of the content of the document, in order to separate the documents.

Claim 1 recites a method for managing email content using an email server, an email induction server and a graphics database, wherein the email server, the email induction server and the graphics database are in communication through a network, the method includes “receiving at the email server an email via the network...electronically monitoring the network email received at the email server for email content...automatically extracting the content of the network email using the email induction server including...analyzing the network email to determine whether the network email includes at least one enclosure, if the network email includes at least one enclosure, determining whether the at least one enclosure is in a non-graphics image format, and converting the content of the network email including the at least one enclosure having a non-graphics image format to a graphics image format...loading the content of the network email into the graphics database accessible from the network...and triggering tasks to be performed as part of a workflow process based on the content extracted from at least of the network email and the at least one enclosure included with the network email.”

Neither Hull nor Black suggest or describe, alone or in combination, a method for managing email content as recited in Claim 1. More specifically, neither Hull nor Black suggest or describe, alone or in combination, a method for managing email content including automatically extracting content of the network email and *triggering tasks to be performed as part of a workflow process based on the content extracted from at least of the network email and an at least one enclosure included with the network email*. (Emphasis added.)

Rather, Hull describes automatically archiving documents that are emailed, printed, or faxed, regardless of the content of the document, and Black simply describes an automated process for assigning a bates number to each page of the stored image files and for generating a slip sheet between the documents. No combination of Hull and Black describe or suggest *triggering tasks based on the content extracted from the email or enclosure.* (Emphasis added.)

Claims 2-34 depend from independent Claim 1. When the recitations of Claims 2-34 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-34 likewise are patentable over Hull in view of Black.

Claim 6 depends from Claim 1. Specifically, dependent Claim 6 recites the method of Claim 1, and further adds wherein “the step of automatically extracting further comprising automatically extracting the content of the network email including graphic image attachments, documents and parsed text from the email...and the step of loading further comprising the step of associating the extracted content of the network email with business tasks, and automatically triggering tasks to be performed as part of a workflow process based on the content extracted from the network email.”

With respect to Claim 6, neither Hull nor Black, alone or in combination, describe or suggest a method for managing email content as recited in Claims 1 and 6. More specifically, neither Hull nor Black suggest or describe, alone or in combination, a method for managing email content including *automatically extracting content of the network email, wherein the network email including graphic image attachments, documents and parsed text from the email.* (Emphasis added). Furthermore, neither Hull nor Black suggest or describe, alone or in combination, *loading the content of the network email into the graphics database accessible from the network and associating the extracted content of the network email with business tasks.* (Emphasis added.) Lastly, neither Hull nor Black suggest or describe, alone or in combination, *triggering the tasks to be performed as part of a workflow process based on the content extracted from at least of the network email and an at least one enclosure included with the network email.* (Emphasis added.)

Independent Claim 35 recites a system for managing email content of a network, comprising “an email server configured to monitor incoming email of the network for content...a graphics database for storing data files...and an email induction server connected in communication with the email server and the graphics database through the network, the email induction server configured to: (a) automatically extract content from the email by...analyzing the email to determine whether the email includes at least one enclosure, and if the email includes at least one enclosure, determining whether the at least one enclosure is in a non-graphics image format, (b) convert the content of the email including the at least one enclosure having a non-graphics image to a graphics image, (c) load the content of the converted email to the graphics database accessible from the network, (d) trigger tasks to be performed as part of a workflow process based on the content extracted from at least one of the email and the at least one enclosure included with the email.”

Claim 35 recites a system for managing email content of a network that includes an email induction server configured to perform steps essentially similar to those method steps recited in Claim 1. Thus, it is submitted that Claim 35 is patentable over Hull in view of Black for at least the reasons that correspond to those given with respect to Claim 1.

Claims 37-41 depend from independent Claim 35. When the recitations of Claims 37-41 are considered in combination with the recitations of Claim 35, Applicants submit that dependent Claims 37-41 likewise are patentable over Hull in view of Black.

Independent Claim 42 recites an email system for processing email for a network, the system including an email server configured to monitor incoming email of the network for content, a graphics database for storing data files, and an email induction server connected in communication with the email server and the graphics database through the network, the email induction server including application software configured to “analyze the email to determine whether the email includes at least one enclosure, if the email includes at least one enclosure, determine whether the at least one enclosure is in a non-graphics image format...extract content from the email...convert the content of the email including the at least one enclosure having a non-graphics image to a graphics image...load the content of the converted email to the graphics database accessible from the network...and trigger tasks to be performed as part of a workflow

process based on the content extracted from at least one of the email and the at least one enclosure included with the email.”

Claim 42 recites a system for managing email content of a network that includes an email induction server including application software configured to perform steps essentially similar to those steps recited in Claims 1 and 35. Thus, it is submitted that Claim 42 is patentable over Hull in view of Black for at least the reasons that correspond to those given with respect to Claims 1 and 35.

Claim 43 depends from independent Claim 42. When the recitations of Claim 43 are considered in combination with the recitations of Claim 42, Applicants submit that dependent Claim 42 likewise is patentable over Hull in view of Black.

Independent Claim 44 recites a process for memorializing email content using an email server, an email induction server and a graphics database, wherein the email server, the email induction server and the graphics database are in communication through a network, the process including “communicating email from a computer to the email server, *wherein the email includes data describing an insurance claim submitted for processing...automatically extracting the content of the email including the insurance claim data using the email induction server including:* analyzing the email to determine whether the email includes at least one enclosure, if the email includes at least one enclosure, determining whether the at least one enclosure is in a non-graphics image format, and converting content of the email including the at least one enclosure having a non-graphics image format to one or more graphic images for storage within the graphics database in response to receiving the email at the email server...automatically communicating acknowledgment to the email server that the content is graphically memorialized...and *triggering insurance claim processing tasks to be performed to process the submitted insurance claim data based on the content extracted from at least one of the email and the at least one enclosure included with the email.*”

Claim 44 recites a process for memorializing email content that performs steps essentially similar to those steps recited in Claims 1, 35, and 42. Thus, it is submitted that Claim 44 is

patentable over Hull in view of Black for at least the reasons that correspond to those given with respect to Claims 1, 35 and 42.

Moreover, Claim 44 recites "communicating email from a computer to the email server, *wherein the email includes data describing an insurance claim submitted for processing...automatically extracting the content of the email including the insurance claim data using the email induction server including...triggering insurance claim processing tasks to be performed to process the submitted insurance claim data based on the content extracted from at least one of the email and the at least one enclosure included with the email.*"

Neither Hull nor Black suggest or describe, alone or in combination, a process for memorializing email content as recited in Claim 44. More specifically, neither Hull nor Black suggest or describe, alone or in combination, a process for memorializing email content *wherein the email includes data describing an insurance claim and the process includes automatically extracting the content of the email including the insurance claim data and triggering insurance claim processing tasks to be performed to process the submitted insurance claim data based on the content extracted.* (Emphasis added.)

Claims 45 and 46 depends from independent Claim 44. When the recitations of Claims 45 and 46 are considered in combination with the recitations of Claim 44, Applicants submit that dependent Claims 45 and 46 likewise are patentable over Hull in view of Black.

For at least the reasons set forth above, Applicant respectfully requests that the rejection of Claims 1-35 and 37-46 under 35 U.S.C. § 103(a) be withdrawn.

In addition, Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Neither Hull nor Black, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Hull or Black, because there is no motivation to combine the references suggested in the art. The Examiner only offers the conclusory

statement that "it would have been obvious to one of ordinary skill in the Computer networking art at the time of the invention to combine the teachings of Hull...with the teachings of Black... because conversion of email attachments into a standard format simplifies document storage."

Thus, it is clear that the present Section 103 rejection is based on a combination of teachings selected in an attempt to arrive at the claimed invention. Since there is no teaching nor suggestion in the cited art for the combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



---

Daniel M. Fitzgerald  
Registration No. 38,880  
ARMSTRONG TEASDALE LLP  
One Metropolitan Square, Suite 2600  
St. Louis, Missouri 63102-2740  
(314) 621-5070